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*Via ECF*

Hon. Philip M. Halpern  
United States District Court  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601

Re: *Chun-Ko Chang v. Shen Yun Performing Arts, Inc., et al.*, No. 24-cv-8980-PMH (S.D.N.Y.)

Dear Judge Halpern:

Thank you for giving the plaintiff currently named as John Doe an opportunity to withdraw his motion to proceed under a pseudonym to prevent the materials he submitted *ex parte* from being disclosed to Defendants. Plaintiff has decided to proceed using his real name, Hoffman Zhu (it is also sometimes spelled "Hoffmann"). Plaintiff hereby withdraws the motion to proceed under a pseudonym, as well as the related motions to seal and to submit materials *ex parte*. ECF No. 70. Given that Mr. Zhu has withdrawn his requests, Mr. Zhu requests that Defendant International Bank of Chicago's motion to compel (ECF No. 76) production of the unredacted versions of ECF Nos. 70, 71, 72, and 73 be denied as moot.

Additionally, Mr. Zhu requests that the Court strike from the docket ECF No. 71, which consists of Mr. Zhu's *ex parte* submission, as well as the unredacted version of the brief reflecting the information contained in that submission. *E.g.*, *Outlaw v. City of New York*, No. 22 CIV. 9288 (PAE), 2024 WL 4825955, at \*3 (S.D.N.Y. Nov. 19, 2024) (noting that district courts have the "inherent power" to "strike material from the docket" and citing *Dietz v. Bouldin*, 579 U.S. 40, 45 (2016) for the proposition that that power is grounded in "the control necessarily vested in courts to manage their own affairs so as to achieve the orderly and expeditious disposition of cases") (cleaned up).

Finally, Mr. Zhu requests the Court's leave to file a version of the Second Amended Complaint that uses Mr. Zhu's real name and that removes allegations relating to his request to proceed under a pseudonym.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Times Wang".

Times Wang

Cc: Counsel of record (via ECF)